

UNITED STATES DISTRICT COURT
for the
Northern District of California

In Re: DMCA Subpoena to Mediolex Ltd.

Plaintiff

v.

Civil Action No.

Defendant

CV 19 80265 MISC

SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS
OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION

TSH

To:

Copyright Agent, Mediolex Ltd. Legal Department
Dzianis Beltyukov, Darzauglu 1, Riga, LV-1012 LATVIA, editor@complaintsboard.com

(Name of person to whom this subpoena is directed)

☒ **Production:** **YOU ARE COMMANDED** to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material: All e-mail address, IP address, DNS hostname, account creation timestamp and/or other identifying information associated with ComplaintsBoard user accounts used to create and/or upload content at the URLs listed in Exhibit A.

Place: 956 Carolina Street, San Francisco, CA 94107 or in the
alternative, aaron.greenspan@plainsite.org

Date and Time:

10/29/2019 5:00 pm

☐ **Inspection of Premises:** **YOU ARE COMMANDED** to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place:

Date and Time:

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 10/24/2019

CLERK OF COURT

HILARY JACKSON

OR

Signature of Clerk or Deputy Clerk

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing (name of party) pro se party
, who issues or requests this subpoena, are:

Aaron Greenspan, 956 Carolina Street, San Francisco, CA 94107, +14156709350, aaron.greenspan@plainsite.org

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

Exhibit A

1. <https://www.complaintsboard.com/complaints/aaron-jacob-greenspan-owner-of-plainsiteorg-under-fraudulent-501c-where-his-crazy-father-is-the-vp-and-treasurer-hacking-and-illegal-downloading-of-sealed-legal-documents-from-various-state-and-federal-agencies-c961506.html>
2. <https://www.complaintsboard.com/complaints/aaron-greenspan-plainsiteorg-downloading-peoples-personal-information-in-a-selective-manner-from-pacer-to-make-money-with-plainsiteorg-c966010.html>
3. <https://www.complaintsboard.com/complaints/neil-s-greenspan-vp-and-treasurer-for-plainsiteorg-under-fraudulent-501c-non-profit-called-think-computer-hacking-in-to-state-and-federal-databases-to-download-sealed-and-sensitive-information-c961512.html>
4. <https://www.complaintsboard.com/complaints/aaron-greenspan-plainsiteorg-under-fraudulent-501c-think-computer-his-father-is-the-vp-and-treasurer-aaron-greenspan-uses-his-website-plainsiteorg-to-terrorize-harass-and-stalks-people-c970509.html>
5. <https://www.complaintsboard.com/complaints/aaron-greenspan-aka-aaron-jacob-greenspan-plainsiteorg-plainsiteorg-under-fraudulent-501c-think-computer-censor-father-neil-s-greenspan-is-the-vp-and-treasurer-c959688.html>
6. <https://www.complaintsboard.com/complaints/wwwplainsiteorg-aaron-jacob-greenspan-aaron-jacob-greenspan-posting-personal-and-private-information-on-his-website-c849789.html>
7. <https://www.complaintsboard.com/complaints/aaron-sociopath-greenspan-plainsiteorg-plainsiteorg-under-illegal-501c-think-computer-his-father-neil-sociopath-greenspan-is-the-vp-and-treasurer-c959670.html>
8. <https://www.complaintsboard.com/thumb.php?src=Aaron%20Jacob%20Greenspan%20of%20plainsite%20and%20think%20computer%20foundation.jpg&wmax=900&hmax=900&nocrop=true&complaints=961506&comment=1892412>
9. https://www.complaintsboard.com/thumb.php?src=compl_15159474891734.jpg&wmax=900&hmax=900&nocrop=true&complaints=961506
10. https://www.complaintsboard.com/thumb.php?src=compl_15153418114537.jpg&wmax=900&hmax=900&nocrop=true&complaints=959670
11. <https://www.complaintsboard.com/thumb.php?src=YWFyb24gamFjb2IgZ3JlZW5zcGFuLmpwZW%3D%3D.jpg&wmax=900&hmax=900&nocrop=true&complaints=849789>
12. https://www.complaintsboard.com/thumb.php?src=compl_15174380782230.jpg&wmax=900&hmax=900&nocrop=true&complaints=966010
13. <https://www.complaintsboard.com/thumb.php?src=neil.jpg&wmax=900&hmax=900&nocrop=true&complaints=961506&comment=1892411>
14. <https://www.complaintsboard.com/thumb.php?src=Neil%20Greenspan%20bio.png&wmax=900&hmax=900&nocrop=true&complaints=961506&comment=1892411>
15. https://www.complaintsboard.com/thumb.php?src=compl_15153407656440.png&wmax=900&hmax=900&nocrop=true&complaints=959670&comment=1847514
16. <https://www.complaintsboard.com/complaints/plainsiteorg-think-computer-corporation-aaron-greenspan-c1078599.html>
17. <https://www.complaintsboard.com/plainsite-org-think-computer-corporation/data-mining-of-the-publics-personal-and-sensitive-information-that-is-being-used-to-snoop-harass-stalk-and-destroy-peoples-lives-c1160770>

If any of the above content is unavailable at the present time, then substitute the associated complaint ID or comment ID where possible as indicated in each URL.

From: Aaron Greenspan aaron.greenspan@PLAINSITE.ORG
Subject: DMCA Takedown Request
Date: March 22, 2018 at 11:04 PM
To: abuse@steadfast.net
Cc: Karl Zimmerman karl@steadfast.net, Paul Voswinkel paul@steadfast.net

To Whom It May Concern:

My name is Aaron Greenspan. A website that your company hosts (according to WHOIS information and your own admission), complaintsboard.com, presumably owned by Mediolex Ltd., is infringing on at least seven copyrights I own.

Original Works

These seven articles and several other copyrighted works were copied onto your servers or network without permission. The six originals, to which I own the exclusive copyrights, can be found at:

1. Text - October 12, 2014, "The Internet Court is Now In Session" by Aaron Greenspan - <http://www.aarongreenspan.com/writing/20141012/the-internet-court-is-now-in-session/>
 2. Photograph - Aaron Greenspan headshot - <http://www.adweek.com/digital/aaron-greenspan-discovered-ims-mark-zuckerberg/>
 3. Photograph - Aaron Greenspan in red shirt 1 - <http://gawker.com/5270663%2Ffacebook-disappears-legal-problem>
 4. Photograph - Aaron Greenspan in red shirt 2 - https://www.computerhope.com/people/aaron_greenspan.htm
 5. Photograph - Aaron Greenspan in black shirt - <https://pbs.twimg.com/media/DKXizdwUQAAXgsd.jpg:large>
 6. Photograph - Neil Greenspan - <http://www.neilgreenspan.com/about/neil.jpg>
 7. Graphic Design - https://www.amazon.com/Authoritas-Students-Admissions-Founding-Facebook/dp/1606690000/ref=ed_oe_h
- See also United States Copyright Office Registration No. TX0006890602 (2008-06-07) covering (4) and (7).

Infringing Works

The unauthorized and infringing copies can all be found at various locations on the pages at:

- A. <https://www.complaintsboard.com/complaints/aaron-jacob-greenspan-owner-of-plainsiteorg-under-fraudulent-501c-where-his-crazy-father-is-the-vp-and-treasurer-hacking-and-illegal-downloading-of-sealed-legal-documents-from-various-state-and-federal-agencies-c961506.html>
- B. <https://www.complaintsboard.com/complaints/aaron-greenspan-plainsiteorg-downloading-peoples-personal-information-in-a-selective-manner-from-pacer-to-make-money-with-plainsiteorg-c966010.html>
- C. <https://www.complaintsboard.com/complaints/neil-s-greenspan-vp-and-treasurer-for-plainisteorg-under-fraudulent-501c-non-profit-called-think-computer-hacking-in-to-state-and-federal-databases-to-download-sealed-and-sensitive-information-c961512.html>
- D. <https://www.complaintsboard.com/complaints/aaron-greenspan-plainsiteorg-under-fraudulent-501c-think-computer-his-father-is-the-vp-and-treasurer-aaron-greenspan-uses-his-website-plainsiteorg-to-terrorize-harass-and-stalks-people-c970509.html>
- E. <https://www.complaintsboard.com/complaints/aaron-greenspan-aka-aaron-jacob-greenspan-plainsiteorg-plainsiteorg-under-fraudulent-501c-think-computer-censor-father-neil-s-greenspan-is-the-vp-and-treasurer-c959688.html>
- F. <https://www.complaintsboard.com/complaints/wwwplainsiteorg-aaron-jacob-greenspan-aaron-jacob-greenspan-posting-personal-and-private-information-on-his-website-c849789.html>
- G. <https://www.complaintsboard.com/complaints/aaron-sociopath-greenspan-plainsiteorg-plainsiteorg-under-illegal-501c-think-computer-his-father-neil-sociopath-greenspan-is-the-vp-and-treasurer-c959670.html>

Additional Infringing Works

Additional specific URL that violate federal copyright statutes (17 U.S.C. § 101 et seq), including but not limited to the DMCA, include:

- H. <https://www.complaintsboard.com/thumb.php?src=Aaron%20Jacob%20Greenspan%20of%20plainsite%20and%20think%20computer%20foundation.jpg&wmax=900&hmax=900&nocrop=true&complaints=961506&comment=1892412> [corresponding to (2) above]
- I. https://www.complaintsboard.com/thumb.php?src=compl_15159474891734.jpg&wmax=900&hmax=900&nocrop=true&complaints=961506 [corresponding to (3) above]
- J. https://www.complaintsboard.com/thumb.php?src=compl_15159474891734.jpg&wmax=900&hmax=900&nocrop=true&complaints=961506

J. [https://www.complaintsboard.com/thumb.php?](https://www.complaintsboard.com/thumb.php?src=compl_15153418114537.jpg&wmax=900&hmax=900&nocrop=true&complaints=959670)

[src=compl_15153418114537.jpg&wmax=900&hmax=900&nocrop=true&complaints=959670](https://www.complaintsboard.com/thumb.php?src=compl_15153418114537.jpg&wmax=900&hmax=900&nocrop=true&complaints=959670) [corresponding to (3) above]

K. [https://www.complaintsboard.com/thumb.php?](https://www.complaintsboard.com/thumb.php?src=YWFyb24gamFjb2lgZ3JlZW5zcGFuLmpwZWw%3D%3D.jpg&wmax=900&hmax=900&nocrop=true&complaints=849789)

[src=YWFyb24gamFjb2lgZ3JlZW5zcGFuLmpwZWw%3D%3D.jpg&wmax=900&hmax=900&nocrop=true&complaints=849789](https://www.complaintsboard.com/thumb.php?src=YWFyb24gamFjb2lgZ3JlZW5zcGFuLmpwZWw%3D%3D.jpg&wmax=900&hmax=900&nocrop=true&complaints=849789) [corresponding to (4) above]

L. [https://www.complaintsboard.com/thumb.php?](https://www.complaintsboard.com/thumb.php?src=compl_15174380782230.jpg&wmax=900&hmax=900&nocrop=true&complaints=966010)

[src=compl_15174380782230.jpg&wmax=900&hmax=900&nocrop=true&complaints=966010](https://www.complaintsboard.com/thumb.php?src=compl_15174380782230.jpg&wmax=900&hmax=900&nocrop=true&complaints=966010) [corresponding to (5) above]

M. [https://www.complaintsboard.com/thumb.php?](https://www.complaintsboard.com/thumb.php?src=neil.jpg&wmax=900&hmax=900&nocrop=true&complaints=961506&comment=1892411)

[src=neil.jpg&wmax=900&hmax=900&nocrop=true&complaints=961506&comment=1892411](https://www.complaintsboard.com/thumb.php?src=neil.jpg&wmax=900&hmax=900&nocrop=true&complaints=961506&comment=1892411) [corresponding to (6) above]

N. [https://www.complaintsboard.com/thumb.php?](https://www.complaintsboard.com/thumb.php?src=Neil%20Greenspan%20bio.png&wmax=900&hmax=900&nocrop=true&complaints=961506&comment=1892411)

[src=Neil%20Greenspan%20bio.png&wmax=900&hmax=900&nocrop=true&complaints=961506&comment=1892411](https://www.complaintsboard.com/thumb.php?src=Neil%20Greenspan%20bio.png&wmax=900&hmax=900&nocrop=true&complaints=961506&comment=1892411) [corresponding to (6) above]

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[src=compl_15153407656440.png&wmax=900&hmax=900&nocrop=true&complaints=959670&comment=1847514](https://www.complaintsboard.com/thumb.php?src=compl_15153407656440.png&wmax=900&hmax=900&nocrop=true&complaints=959670&comment=1847514) [corresponding to (7) above]

Additionally, **ALL OTHER PHOTOGRAPHS on these pages are copyrighted** by various publications and institutions and/or their photographers including The New York Times, The Cleveland Plain Dealer, the Otago Daily Times, VentureBeat, TechCrunch, and Case Western Reserve University, among others.

Content Intended to Result In Physical Harm and/or Harassment Under Massachusetts General Laws § 43A

Furthermore, other pages on complaintsboard.com, including but not limited to:

P. <https://www.complaintsboard.com/complaints/wwwplainsiteorg-they-posted-wrong-details-about-me-they-ruined-my-life-c783354.html>

are clearly intended to bring physical harm to myself and my family members by posting home address information, which is a violation of Massachusetts General Laws § 43A. Upon information and belief, the vast majority of these posts are the work of a single individual in Massachusetts, Diego MasMarques. **As a service provider, you do not have immunity under this statute. The pages above should be completely removed within 48 hours from the date of this notice or you will face legal action.**

DMCA Notice

This letter is official notification under Section 512(c) of the Digital Millennium Copyright Act ("DMCA"), and I seek the removal of the aforementioned infringing material from your servers. I request that you immediately notify the infringer of this notice and inform them of their duty to remove the infringing material immediately, and notify them to cease any further posting of infringing material to your server in the future.

Please also be advised that law requires you, as a service provider, to remove or disable access to the infringing materials upon receiving this notice. Under US law a service provider, such as yourself, enjoys immunity from a copyright lawsuit provided that you act with deliberate speed to investigate and rectify ongoing copyright infringement. If service providers do not investigate and remove or disable the infringing material this immunity is lost. Therefore, in order for you to remain immune from a copyright infringement action you will need to investigate and ultimately remove or otherwise disable the infringing material from your servers with all due speed should the direct infringer, your client, not comply immediately.

I am providing this notice in good faith and with the reasonable belief that rights I own are being infringed.

Under penalty of perjury I certify that the information contained in the notification is both true and accurate, and I have the authority to act on behalf of the owner of the copyright(s) involved.

Should you wish to discuss this with me please contact me directly. You can reach me at aaron.greenspan@plainsite.org or by phone at +1 415 670 9350.

/s/Aaron Greenspan/
Aaron Greenspan

From: Aaron Greenspan aaron.greenspan@PLAINSITE.ORG
Subject: DMCA Takedown Request
Date: October 24, 2019 at 1:41 PM
To: editor@complaintsboard.com

To Whom It May Concern:

My name is Aaron Greenspan. A website that your company hosts (according to WHOIS information and your own admission), complaintsboard.com, presumably owned by Mediolex Ltd., is infringing on at least one copyright I own.

Original Works

These articles and copyrighted works were copied onto your servers or network without permission. The original(s), to which I own the exclusive copyrights, can be found at:

1. Photograph - Aaron Greenspan in purple shirt - <http://www.aarongreenspan.com/about/aaron.jpg>
2. Essay - "The Internet Court Is Now In Session" - <http://www.aarongreenspan.com/writing/20141012/the-internet-court-is-now-in-session/>

Infringing Works

The unauthorized and infringing copies can all be found at:

- A. <https://www.complaintsboard.com/plainsite-org-think-computer-corporation/data-mining-of-the-publics-personal-and-sensitive-information-that-is-being-used-to-snoop-harass-stalk-and-destroy-peoples-lives-c1160770>
- B. <https://www.complaintsboard.com/complaints/plainsiteorg-think-computer-corporation-aaron-greenspan-c1078599.html>

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Please also be advised that law requires you, as a service provider, to remove or disable access to the infringing materials upon receiving this notice. Under US law a service provider, such as yourself, enjoys immunity from a copyright lawsuit provided that you act with deliberate speed to investigate and rectify ongoing copyright infringement. If service providers do not investigate and remove or disable the infringing material this immunity is lost. Therefore, in order for you to remain immune from a copyright infringement action you will need to investigate and ultimately remove or otherwise disable the infringing material from your servers with all due speed should the direct infringer, your client, not comply immediately.

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Should you wish to discuss this with me please contact me directly. You can reach me at aaron.greenspan@plainsite.org or by phone at +1 415 670 9350.

/s/Aaron Greenspan/
Aaron Greenspan